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Ecolab, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JENNIFER COUNCILL, an individual,

Plaintiff,

vs.

ECOLAB, INC., a foreign Corporation, DOES
1-50, inclusive and ROE CORPORATIONS 1-
50, inclusive,

Defendants.

Case No. 2:21-cv-01889-JAD-EJY

**STIPULATION AND ORDER TO
SUBMIT MATTER TO BINDING
ARBITRATION AND STAY ACTION
PENDING ARBITRATION**

ECF No. 4

IT IS HEREBY STIPULATED by and between Plaintiff Jennifer Councill (“Plaintiff”), through her counsel HKM Employment Attorneys LLP, and Defendant Ecolab, Inc. (“Defendant”), through its counsel Jackson Lewis P.C., as follows:

1. On October 13, 2021, Plaintiff filed a complaint alleging wage and hour claims under federal and state law, and noting Plaintiff intends to amend the complaint to add disability discrimination claims under federal and state law once administrative exhaustion is completed.

2. Defendant’s response to the Complaint is currently due on November 5, 2021.

3. Plaintiff and Defendant have determined the Parties entered into an arbitration agreement requiring Plaintiff and Defendant to submit to final and binding arbitration any and all claims and disputes that arise from or relate to Plaintiff’s employment or termination of her employment with Defendant (the “Arbitration Agreement”). The Parties agree the claims alleged by Plaintiff against Defendant in the Action fall within the scope of the Arbitration Agreement.

5. All proceedings in this Action shall be stayed and this Court shall retain jurisdiction over this Action pending the conclusion of the arbitration with AAA.

Dated this 3rd day of November, 2021.

JACKSON LEWIS P.C.

/s/ Deverie J. Christensen

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Attorneys for Defendant

Based on the parties' stipulation [ECF No. 4], **IT IS SO ORDERED. This case is stayed pending the completion of binding arbitration proceedings. The Clerk of Court is directed to ADMINISTRATIVELY CLOSE this case. Any party who desires to seek further action in this case will first have to file a motion to reopen it.**

U.S. District Judge Jennifer A. Dorsey
Dated: November 5, 2021